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**From:** Topinka, Natalie [topinka.natalie@epa.gov]  
**Sent:** 12/12/2017 8:50:55 PM  
**To:** Breneman, Sara [breneman.sara@epa.gov]  
**Subject:** FW: Workgroup Meeting: SAN 5719.8 "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration"

From R3...

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**From:** Vyas, Himanshu  
**Sent:** Tuesday, December 12, 2017 2:46 PM  
**To:** Thompson, Lisa <Thompson.Lisa@epa.gov>; Chan, Elizabeth <Chan.Elizabeth@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>; DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Durkee, Stanley <Durkee.Stan@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Dewees, Jason <Dewees.Jason@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Eisele, Adam <Eisele.Adam@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Pryor, Justin <Pryor.Justin@epa.gov>; Davis, Alison <Davis.Alison@epa.gov>  
**Subject:** RE: Workgroup Meeting: SAN 5719.8 "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration"

Good afternoon, Lisa.

I briefed my RA on the tiering and in preparation for the Friday's Early Guidance call to which he is invited. I let him know that the workgroup members concurrence on the tiering process was sought and that it is due by COB today. My recommendation to my division director and to my RA was that the rules shouldn't be split up and that the entire package should remain as a Tier 1 rule. He noted that he is scheduled to meet with Bill Wehrum tomorrow in D.C. and he wants to have a chance to discuss the issues, and so Region 3 will not provide our concurrence today but will hold off until Thursday.

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-----Original Appointment-----

**From:** Thompson, Lisa  
**Sent:** Thursday, December 07, 2017 9:14 AM

**To:** Vyas, Himanshu; Chan, Elizabeth; Hambrick, Amy; Cozzie, David; DeFigueiredo, Mark; Weitz, Melissa; Mia, Marcia; Gregory, John; Sorrell, Virginia; Branning, Amy; Gilbreath, Jan; Kopits, Elizabeth; Marten, Alex; Durkee, Stanley; Topinka, Natalie; Lawrence, Rob; Beeler, Cindy; Marsh, Karen; Witosky, Matthew; Witt, Jon; Garwood, Gerri; Dewees, Jason; Miller, Elizabeth; Waltzer, Suzanne; Eisele, Adam; Alsalam, Jameel; Pryor, Justin; Davis, Alison

**Subject:** Workgroup Meeting: SAN 5719.8 "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration"

**When:** Thursday, December 07, 2017 11:00 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Call-in: 919-541-1596 || RTP-E149

Agenda for today's discussion:

1. Update on 12/1 and 12/4 meetings with Bill Wehrum
2. Path forward - dual-tracked 'technical' and 'policy' reconsideration rulemakings
  - a. Technical rulemaking – will address implementation issues (attached)
  - b. Policy rulemaking – will address whether to regulate methane as a greenhouse gas and how to best define the oil and gas source category
3. Request workgroup to down tier Technical rulemaking to Tier 3, **please provide approval by email by COB 12/12.** Policy rulemaking will remain Tier 1.
  - a. Rationale for down tier request

This NPRM is a reconsideration of NSPS OOOOa. The focus of this action is on technical issues related to implementation of the final OOOOa standards. These issues directly affect how facilities comply with the rule, and the proposed options and alternatives will provide streamlined requirements and reduced burden of compliance. EPA has identified and summarized some of these areas for improvement in the June 16, 2017, proposals to stay certain requirements in OOOOa and further solicited comment in the notices of data availability (NODAs) signed by the EPA Administrator on November 1, 2017. These technical issues are discreet and separate from broader policy issues within this rule, such as the regulation of methane, which will be covered in a separate rulemaking and tiered separately. Given the technical nature of this action, we are requesting a Tier 3 designation consistent with other technical reconsiderations of regulations.

- b. **Workgroup instructions:** Pending your agreement, we ask that each workgroup member provide approval by email by COB 12/12.
4. Early Guidance on Policy rulemaking scheduled with the Administrator – Friday 12/15 9:45–10:45
  - a. Appears WG not included on invitation
  - b. OAR will send EG Briefing out to WG asap – anticipate 12/12 after internal meeting with OAR

***Please do not distribute these materials outside WG.***

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Bi-weekly check-in meeting for SAN 5719.8 "Oil and Natural Gas Sector: Emission Standards for New, Reconstructed and Modified Sources Reconsideration". Materials / agendas will be sent out prior to each meeting.